

## Remarks

### I. Introduction

There are 28 pending claims in the present application. Of these claims, claims 1, 8, 15, and 22 are independent method claims. The remainder are dependent claims, and claims 2-7 depend from claim 1, claims 9-14 depend from claim 8, claims 16-21 depend from claim 6, and claims 23-28 depend from claim 22.

The Examiner has rejected the pending claims on a variety of bases under 35 U.S.C. § 102 for anticipation and § 103 for obviousness. In each of these bases for rejection, the Examiner has relied primarily on one reference – U.S. Patent No. 6,275,824 to O’Flaherty et al. (“O’Flaherty”). As will be shown, the Examiner has improperly relied on this reference because it teaches away from the claims of the present invention in principle and in fact. The references that have been combined with the O’Flaherty to form the various obviousness rejections include Date, C.J., An Introduction to Database Systems, 7<sup>th</sup> Ed., May 2000, p. 4 (“Date”), Utley, Craig, Designing the Star Schema Database, Feb. 2, 2001, pp. 1 and 6 (“Utley”), and U.S. Patent No. 5,911,143 TO Deinhart et al. (“Deinhart”). However, even when these references are combined with O’Flaherty, the claims of the present invention are not rendered obvious because they fail to cure the infirmities of O’Flaherty to support an obviousness rejection.

The rejections that have been asserted by the Examiner are set forth in the following Table:<sup>1</sup>

Rejected Claims	Anticipation §102	Obviousness §103	Primary Reference	Combining References
<b><i>1-3</i></b>	X		O’Flaherty	
<b><i>4-5</i></b>		X	O’Flaherty	Date
<b><i>6-7</i></b>		X	O’Flaherty	Utley
<b><i>8-10, 15-17, 22-24</i></b>		X	O’Flaherty	Deinhart
<b><i>11-12, 18-19, 25-26</i></b>		X	O’Flaherty	Deinhart, Date
<b><i>13-14, 20-21, 27-28</i></b>		X	O’Flaherty,	Deinhart, Utley

<sup>1</sup> For convenience, the independent claims are shown in bold and italics.

Applicant will address each of the bases for rejection and demonstrate that these rejections are overcome and should be withdrawn. As such, the present invention is in condition for allowance and should be passed to issue in due course.

## II. O'Flaherty

The Examiner has primarily relied on O'Flaherty in forming each of his bases for rejection of the pending claims of the present application. Applicant will now set forth the teachings of O'Flaherty according to that patent's disclosure.

The basic understanding of O'Flaherty that the Examiner has relied upon is set forth in columns 4 and 5 of the patent, which is only a portion of the section of the patent titled "Overview." However, before addressing the disclosure of O'Flaherty at columns 4 and 5, it is believed that the disclosure of this patent in the "Summary of the Invention" ("Summary") is important to understand. In the Summary, it states the following:

The apparatus comprises a database management system, for storing and retrieving data from a plurality of database tables wherein the data in the database tables is controllably accessible according to privacy parameters stored in the database table... (Emphasis added.) (Col. 2, lines 57-61).

The method comprises the steps of extending a database table to store and retrieve privacy parameters for the data stored in the database table, the privacy parameters collectively stored in a plurality of database columns associated with the data... (Emphasis added.) (Col. 3, lines 1-5)

The quotations above from the Summary make plain that what is described in O'Flaherty is centered on privacy parameters that are in the form of additional columns used to extend particular database tables. Moreover, these privacy parameters are described as being stored in the database table with the data to which they apply to form a single database table.

The "Overview" of the O'Flaherty system and method is described at columns 4 to 7 of the patent. This includes the portions of O'Flaherty primarily relied on by the Examiner in columns 4 and 5. The database management system of this patent defines a virtual table and that definition is saved in the database as metadata. What is formed by this method is referred to in O'Flaherty as a "dataview." The virtual table that is the dataview is not physically found in any database until it is needed. (Col. 4, lines 7-15).

Access to the data stored in the extended database (data and privacy parameters) is through what has been termed a “dataview suite.” This system element is a suite of privacy metadata dataviews. The system also permits the override of the customer privacy parameter preferences. Such overrides are monitored so that notice can be made when such overrides occur. (Col. 4, lines 37-48). The limiting of access to data stored in the extended database by use of the privacy dataview suite has three purposes:

- 1) to implement privacy rules to make personal data anonymous,
- 2) to restrict access to opted-out columns,
- 3) to exclude entire rows for opt-out purposes based on consumer opt-outs.

(Col. 4, lines 49-60).

The O’Flaherty system also includes a client interface module that is used by the client to manage its data. The client interface permits the client to modify its privacy parameters preferences. (Col. 4, line 61 – col. 5, line 8). Accordingly, the privacy parameter preferences are layered on top of the data in the database that includes both the protected data and the privacy parameter preferences.

### **III. The Present Invention**

The present invention is an internal security method to prevent unauthorized access to restricted data. Unlike the O’Flaherty system, the present invention does not provide a system that is susceptible to “hacking” even if someone were to gain access to restricted data.

According to the present invention, there is no need for security coding to be layered on top of the system application to prevent unauthorized access to database information. The database structure is created in the form of views that are available to particular system users. These views, however, are not “dataviews” as described in O’Flaherty that include data and privacy parameters associated with such data in a single database. The views according to the present invention are retrievable through the use of primary and foreign keys in such a manner that hacking is thwarted.

The internal security provided by the present invention may be implemented through the database server and not the system server. The system permits hierarchical

viewing of the restricted data information, which will not permit a hacker to gain general access to the data information even though system users share data information.

#### IV. Claims 1-3 Are Not Anticipated By O'Flaherty

On pages 2-3 of the Office Action, the Examiner rejected claims 1-3 under 35 U.S.C. §102 (e) based on O'Flaherty. According to the Examiner, the elements of claim 1 are shown as follows:

<b><i>Claim /Preamble Element</i></b>	<b><i>Examiner's Citations From O'Flaherty</i></b>
1. An internal security method for a relational database system, comprising	Fig. 1, Item 152
(a) determining which data information from the total amount of data information stored in system databases is restricted data information that shall not be accessible by each and every 1 to N system users, where N is an integer greater than 1;	Col. 5, line 32-40; Col. 4, lines 8-18 and 27-29
(b) determining for each system user the restricted data information that such a system user shall have access;	Col. 4, lines 49-60
(c) creating at least one relational access table that is keyed to that system user's access to the restricted data information that was determined at step (b); and	Col. 4, lines 7-18
(d) each system user accessing restricted data information stored in the system databases according to the relational access table created at step (c).	Col. 4, lines 32-34

In the presently amended form of claim 1, the following is recited for element (c):

(c) creating at least one relational access table with each system user having at least one record in the relational access table and using a foreign key in the table created at step (c) that is linked to a primary key associated with a system user's table of the relational database system for controlling the system user's access to the restricted data information that was determined at step (b)...

Applicant submits that at least element (c) is not taught, shown, suggested, disclosed, or contemplated by O'Flaherty.

The legal standard for finding anticipation under 35 U.S.C. § 102 is that a single reference must teach each and every claim element, in the same way. *Brown v. 3M*, 265 F.3d 1349, 1351 (Fed. Cir. 2001) ("To anticipate, every limitation of the claimed invention must be found in a single prior art reference, arranged as in the claim"); *Kloster*

*Speedsteel AB v. Crucible, Inc.*, 793 F.2d 1565, 1571 (Fed. Cir. 1986) (“Absence from the reference of any claimed element negates anticipation”). As will be shown, O’Flaherty does not anticipate claims 1-3 under this standard. Thus, the rejection based on O’Flaherty should be withdrawn.

Element (c) of claim 1, contrary to the table set forth above, recites that the relational access table uses “a foreign key in the table created at step (c) that is linked to a primary key associated with a system user’s table of the relational database system for controlling the system user’s access to the restricted data information that was determined at step (b).” As set forth in the specification of the present application, this is a novel use the primary and foreign keys for internal database security, which is carried out by at least the following:

First:

Referring to Figure 5, use of the primary keys is tracked by Primary Key Index Table 502. Through Table 502, assignments of primary key values are made only once. The primary keys that are assigned via Table 502 will be a foreign key in other Tables. (Specification, p. 4, line 29 to p. 5, line 2)

Second:

One of the items that will have a Primary Key value assigned to it will be each employee. Therefore, when a new employee...joins the company, the company begins a record for that employee. An example of an Employee Table is shown at 504. Employee Table 504 will include a number of fields. The first field is the Primary Key field which will include the Primary Key value that was assigned by Primary Key Index Table 502. (Specification, p. 5, lines 7-12)

Third:

Again referring to Figure 5, preferably, each individual in the company will have his/her restricted data information controlled by a Master Access Table, such as the one at 506....

Master Access Table 506 will have a number of fields. The first field will be the Primary Key for the Master Access Table that may be used as a foreign key for downstream related tables. The second field is the Foreign Key field which relates back to the appropriate Primary Key of Employee Table 504. The remainder of the fields will include information about the restricted materials that will be contained in each record of Master Access table 506, which [in the case of the CFO] will

include the record(s) pertaining to the CFO's access to restricted data information. These records may be increased or decreased by the system administrator based on directives from the appropriate authorities within the company. Each change of this type will change the system user's access level. (Specification, p. 14, lines 20-28)

The three quotations immediately above from the specification of the present application clearly demonstrate the use of the primary and foreign keys to effect internal security for a relational database structure. O'Flaherty uses an extended database method that incorporates both data and privacy parameter preferences in the same database. As such, should access be gained to that database, the privacy parameter preferences would be understood and could be changed. This would not be possible for the system of the present invention because even access to the database containing protected data would not provide an ability to have any knowledge of the security details of the database owner or provide an ability to change privacy preferences as would be possible with the O'Flaherty system.

The Examiner's statement at page 3, lines 11-15 regarding the existence of foreign and primary keys does not address in any way the use of foreign and primary keys to control internal security of relational database structures.

Applicant asserts that O'Flaherty at least does not include element (c) of claim 1. Noting this, O'Flaherty does not anticipate claim 1 under the standard stated above that must be met for the Examiner to sustain an anticipation rejection. Therefore, that anticipation rejection cannot be sustained. Applicant has traversed the Examiner's anticipation rejection based on O'Flaherty and requests that this rejection be withdrawn.

Claims 2 and 3 add further limitations to claim 1. Therefore, claims 2 and 3 have all of the features of claim 1. Given this, claims 2 and 3 are not anticipated by O'Flaherty for the same reasons as claim 1. Applicant has traversed the anticipation rejection based on O'Flaherty as it has been applied to claims 2 and 3, and requests that this rejection be withdrawn.

## **V. Claims 4-28 Are Not Obvious in View of Combinations That Include O'Flaherty as the Principal Reference**

Referring to the Table in Section I that indicates each of the rejections issued by the Examiner in the Office Action, it is seen that the Examiner has rejected claims 4-28

for obviousness. Each of the bases for rejecting these claims under 35 U.S.C. § 103 for obviousness relies on O’Flaherty as the primary reference that is combined with one or more of Date, Utley, and/or Deinhart. Applicant will demonstrate herein that claims 4-28 are not obvious in view of these combinations of references.

The legal standard for a finding of obviousness based on a single reference is that there must be a showing of a suggestion or motivation to modify the teachings of the reference to demonstrate the claimed invention. *B.F. Goodrich Company v. Aircraft Breaking Sys. Corp.*, 72 F.3d 1577, 1582 (Fed. Cir. 1996) (“When obviousness is based on a particular prior art reference, there must be a showing of a suggestion or motivation to modify the teachings of that reference.”) Further, in order to properly combine references for supporting an obviousness rejection there must be some teaching, suggestion, or motivation to combine the references. *Akamai Technologies, Inc. v. Cable & Wireless Internet Services, Inc.*, 344 F. 3d 1186, 1196 (Fed. Cir. 2003) (“When a rejection depends on a combination of prior art references, there must be some teaching, suggestion, or motivation for combining these references.”) Applicant submits that these standards are not met by O’Flaherty alone or O’Flaherty combined with Date, Utley, or Deinhart.

### **A. Claims 4 and 5 Are Not Obvious**

The Examiner has rejected claims 4 and 5 under 35 U.S.C. § 103 for obviousness based on O’Flaherty in view of Date. Claims 4 and 5 depend from claim 1, and include all of the features of claim 1.

With regard to claim 4, O’Flaherty has been cited for its teachings as discussed with respect to the rejection of claims 1-3, and Date has been cited for the following:

According to Date, Update is expressed in the SQL language (Page 4 No. 5), SQL is an industry query language used in relational database[s]. Therefore, it would have been obvious to one of ordinary skill in the art at the time the invention was made to combine Date’s Update (addition) instruction with the O’Flaherty’s system, because Update...is a standard SQL instruction and using an update instruction would make O’Flaherty’s database changeable. (Office Action, p. 4, lines 8-13)

Regarding claim 5, O’Flaherty has been applied in the same way as it has been applied to claim 4, and the Examiner has stated the following with respect to Date:

According to Date, Delete is expressed in the SQL language (Page 4 No. 5), SQL is an industry query language used in relational database[s]. Therefore, it would have been obvious to one of ordinary skill in the art at the time the invention was made to combine Date's Delete instruction with the O'Flaherty's system, because Delete...is a standard SQL instruction and using...[a] Delete instruction would make O'Flaherty's database changeable. (Office Action, p. 4, lines 18-22)

As set forth in Section IV of this Response, Applicant has demonstrated that O'Flaherty does not teach at least element (c) of claim 1. Since claims 4 and 5 depend from claim 1, each of these claims includes the features of claim 1. Therefore, O'Flaherty also does not teach or suggest this element to the extent that it is part of claims 4 and 5. A review of Date demonstrates that it does not cure this infirmity of O'Flaherty. Moreover, a review of the combination of O'Flaherty and Date makes plain that such a combination does not render claims 4 and 5 at least because of the inclusion of step (c) in these claims. Having overcome the obviousness rejection raised against claim 4 and 5, the Examiner should withdraw this rejection.

## **B. Claims 6 and 7 Are Not Obvious**

The Examiner has rejected claims 6 and 7 under 35 U.S.C. § 103 for obviousness based on the O'Flaherty in view of Utley. Claims 6 and 7 depend from claim 1 and, therefore, include all of the features of claim 1.

With regard to claims 6 and 7, O'Flaherty has been applied for its teachings as discussed with respect to the rejection of claims 1-3, and Utley was cited for the following alleged teaching:

According to [Utley] the Star Schema database is an OLAP (Online Analytical Processing) system (Page 1 paragraph 4). As OLAP uses a large scale of indexing, it is very convenient for data retrieval (Page 6 paragraph 1 line[s] 4-15, Page 1 paragraph 4 line[s] 1-7). Therefore, it would have been obvious to one of ordinary skill in the art at the time the invention was made to interconnect O'Flaherty's databases in a star schema configuration as taught by Utley because it would have made the data retrieval much faster and more efficient. (Office Action, p. 5, lines 8-14; p. 5, line 19 - p. 6, line 2)

As set forth in Section IV of this Response, Applicant has demonstrated that O'Flaherty does not teach at least element (c) of claim 1. As such, because claims 6 and 7



depend from claim 1, these claims include this feature of claim 1. Given this, O’Flaherty also does not teach or suggest this element to the extent that it is part of claims 6 and 7. A review of Utley demonstrates that it does not cure this infirmity of O’Flaherty. It follows that claims 6 and 7 are not rendered obvious by the combination of O’Flaherty in view of Utley because of the failure of the combination to teach, suggest, consider, or contemplate the novel, nonobvious use of the foreign and primary keys to control internal security. Thus, claims 6 and 7 are not rendered obvious by the combination. Since Applicant has traversed the obviousness rejection raised against claims 6 and 7, Applicant requests that this rejection be withdrawn.

### **C. Claims 8-10, 15-17, And 22-24 Are Not Obvious**

The Examiner has rejected claims 8-10, 15-17, and 22-24 under 35 U.S.C. § 103 for obviousness based on the O’Flaherty in view of Deinhart. Of these claims, claims 8, 15, and 22 are independent claims. Claims 9 and 10 depend from claim 8, claims 16 and 17 depend from claim 15, and claims 23 and 24 depend from claim 22. Independent claims 8, 15, and 22 have been amended to include features of the use of foreign and primary keys to effect the internal security of relational databases in a manner similar to claim 1. This also will mean that the claims that depend for claims 8, 15, and 22 will include this feature.

With respect to Deinhart, the Examiner states the following with regard to claims 8, 15, and 22:

#### Claim 8:

The access control is designed on [the] basis of roles and responsibilities. Role types are organized hierarchically and [the] “first role subsumes a second role type” (Col 5 line[s] 25-35). A role with higher responsibility will include the access over a role with lower responsibility.

Therefore, it would have been obvious to one of ordinary skill in the art at the time the invention was made to combine Deinhart’s role-based hierarchical access control method on [the] database system with O’Flaherty’s system, because in this way one with higher access authority will have control over their own as well as someone else’s data underneath them and Data Integrity / Accuracy of the database is maintained...[through] this hierarchical access control process. (Office Action, p. 7, line 18 – p. 8, line 6)

Claim 15:

The access control is designed on [the] basis of roles and responsibilities (Col 5 line[s] 25-35). A role with higher responsibility will include the access over a role with lower responsibility. It is possible to predefine a view of a higher role to spread over several responsibilities and a lower role could include some responsibility from this role and something else from another role depending on the functional partitioning of the role (Col 8 line[s] 53-58).

Therefore, it would have been obvious to one of ordinary skill in the art at the time the invention was made to combine Deinhart's role-based hierarchical access control method on [the] database system with O'Flaherty's system, because in this way one with higher access authority will have control over their own as well as someone else's data underneath them and Data Integrity / Accuracy of the database is maintained...[through] this hierarchical access control process. (Office Action, p. 10, lines 9-20)

Claim 22:

In Deinhart's reference, the access control is designed on the basis of roles and responsibilities (Col 5 line[s] 25-35).

Therefore, it would have been obvious to one of ordinary skill in the art at the time the invention was made to combine Deinhart's role-based hierarchical access control method on [the] database system with O'Flaherty's system, because in this way one with higher access authority will have control over their own as well as someone else's data underneath them and Data Integrity / Accuracy of the database is maintained...[through] this hierarchical access control process. (Office Action, p. 12, lines 7-15)

Applicant submits that there are at least two bases that would dictate that the combination of O'Flaherty and Deinhart would not render claims 8, 15, and 22 obvious.

Elements 8(e), 15(e), and 22(e) have been amended in a manner similar to 1(c) to include the features of the use of foreign and primary keys to effect internal security for relational databases. This feature is not taught, suggested, contemplated, or considered by O'Flaherty. Furthermore, this feature is not taught, suggested, contemplated, or considered by Deinhart. Thus, any combination of O'Flaherty and Deinhart would not render obvious the invention of claims 8, 15, or 22. Therefore, this is a first basis for traversing the obviousness rejection based on O'Flaherty in view of Deinhart.

The standard for combining references is that there is some “teaching, suggestion, or motivation to combine the references.” Applicant asserts that this standard is not met in combining O’Flaherty and Deinhart.

O’Flaherty discloses a system that creates a database that includes the protected data and privacy parameters. The O’Flaherty system does not contemplate combining with it the teachings of Deinhart relating to roles and views of data based on roles because O’Flaherty creates the combination database for each user separately without any teaching, suggestion, or motivation for the use of roles for the purpose of viewing the combined database. Moreover, the Examiner has not pointed to any teaching, suggestion, or motivation to add the Deinhart teachings to what O’Flaherty teaches as must be done to properly combine references. As such, the Examiner has not met the standard for combining Deinhart with O’Flaherty, thus making the combination improper and any obviousness rejection based on this combination should be withdrawn. This is a second basis by which Applicant traverses the Examiner’s obviousness rejection based on O’Flaherty in view of Deinhart.

Applicant has overcome the Examiner’s basis for rejecting claims 8, 15, and 22 for obviousness based on O’Flaherty in view of Deinhart. Therefore, this ground of rejection should be withdrawn.

As stated, claims 9 and 10 depend from claim 8, claims 16 and 17 depend from claim 15, and claims 23 and 24 depend from claim 22. Each of these dependent claims adds features to the independent claim from which it depends. Therefore, each of the dependent claims is not obvious for the same reasons as the independent claim from which it depends. Thus, Applicant has traversed the obviousness rejection based on O’Flaherty in view of Deinhart as it has been applied to claims 9 and 10, 16 and 17, and 23 and 24, and requests that this rejection be withdrawn.

#### **D. Claims 11-12, 18-19, and 25-26 Are Not Obvious**

The Examiner has rejected claims 11-12, 18-19, and 25-26 under 35 U.S.C. § 103 for obviousness based on the O’Flaherty in view of Deinhart and Date. Claims 11 and 12 depend from claim 8, claims 18 and 19 depend from claim 15, and claims 24 and

25 depend from claim 22. Applicant asserts that the combination of O'Flaherty in view of Deinhart and Date does not render claims 11-12, 18-19, and 25-26 obvious.

With regard to claims 11, 18, and 25, the Examiner has stated the following as the ground of rejection for obviousness:

Regarding claim[s] 11 [18 and 25], O'Flaherty and Deinhart teach the invention substantially as claimed. See the rejection to claim 8.... However, they do not teach [that a] relational access table created at step (c) may have access to additional restricted data information added to it by updating the relational access table after it is created. According to Date, Update is expressed in the SQL language (Page 4 No. 5) and SQL is an industry query language. Therefore, it would have been obvious to one of ordinary skill in the art at the time of the invention was made to combine Date's Update (addition) instruction with the O'Flaherty's system, because Update (addition) is a standard SQL instruction and using an update instruction would make O'Flaherty's database changeable. (Office Action, p. 13, lines 5-13; p. 14, lines 2 and 6)

Regarding claims 12, 19, and 26, the Examiner has stated the following in rejecting these claims for obviousness:

Regarding claim[s] 12 [19 and 26], O'Flaherty teaches the invention substantially as claimed. See the rejection to claim 8.... However, O'Flaherty does not teach [that a] relational access table created at step (c) may have access to certain restricted data information deleted from it by updating the relational access table after it is created. According to Date, Delete is expressed in the SQL language (Page 4 No. 5) and SQL is an industry query language. Therefore, it would have been obvious to one of ordinary skill in the art at the time the invention was made to combine Date's Delete instruction with the O'Flaherty's system, because Delete is a standard SQL instruction and using...[a] Delete instruction would make O'Flaherty's database changeable. (Office Action, p. 13, lines 15-22; p. 14, line 4 and 8)

As set forth in Section IV of this Response, Applicant has demonstrated that O'Flaherty does not teach at least element (c) of claim 1. The features of claim 1(c) are also included in claim 8(e), 15(e), and 22(e) from which claims 11-12, 18-19, and 25-26 depend, respectively. A review of Date and Deinhart demonstrates that neither of these references cures this infirmity of O'Flaherty, nor would either of these references render the invention of claims 11-12, 18-19, and 25-26 obvious. As such, claims 11-12, 18-19, and 25-26 are not rendered obvious by the combination of O'Flaherty in view of Deinhart

and Date. Having overcome the obviousness rejection raised against these claims, the Examiner should withdraw this rejection.

### **E. Claims 13-14, 20-21, and 27-28 Are Not Obvious**

The Examiner has rejected claims 13-14, 20-21, and 27-28 under 35 U.S.C. § 103 for obviousness based on the O'Flaherty in view of Deinhart and Utley. Claims 13 and 14 depend from claim 8, claims 20 and 21 depend from claim 15, and claim 27 and 28 depend from claim 22. Applicant asserts that this combination does not render claims 13-14, 20-21, and 27-28 obvious.

With regard to claims 13-14, 20-21, and 27-28, the Examiner states the following with regard to what O'Flaherty, Deinhart, and Utley allegedly teach:

Regarding claim[s] 13 [14, 20-21, and 27-28], O'Flaherty and Deinhart teach the invention substantially as claimed. See the rejection of claim 8. However, they do not teach [a] relational database system that incorporates the internal security method that includes a star schema configuration. According to [Utley] the Star Schema database is an OLAP (Online Analytical Processing) system (Page 1 paragraph 4). As OLAP uses a large scale of indexing, it is very convenient for data retrieval (Page 6 paragraph 1 line[s] 4-15, Page 1 paragraph 4 line[s] 1-7). Therefore, it would have been obvious to one of ordinary skill in the art at the time the invention was made to interconnect O'Flaherty's databases in a star schema configuration as taught by Utley because it would have made the data retrieval much faster and more efficient. (Office Action, p. 14, lines 14-22, and Office Action, p. 15, lines 2-10)

As set forth in Section IV of this Response, Applicant has demonstrated that O'Flaherty does not teach at least element (c) of claim 1. The features of claim 1(c) are also included in claim 8(e), 15(e), and 22(e) from which claims 13-14, 20-21, and 27-28 depend, respectively. A review of Deinhart and Utley demonstrates that neither reference cures this infirmity of O'Flaherty, nor would either reference render the invention of claims 13-14, 20-21, or 27-28 obvious. Thus, claims 13-14, 20-21, and 27-28 are not rendered obvious by the combination of O'Flaherty in view of Deinhart and Utley. Since Applicant has traversed the obviousness rejection raised against claims 13-14, 20-21, and 27-28, Applicant requests that this rejection be withdrawn.

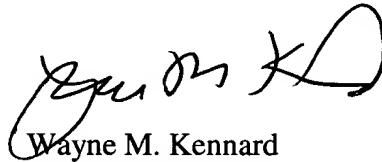
## V. Conclusion

Applicant has traversed each of the Examiner's rejections under 35 U.S.C. § 102 for anticipation based on O'Flaherty and under 35 U.S.C. § 103 for obviousness based on O'Flaherty in various combinations Date, Utley, and Deinhart. Having traversed these grounds of rejection, it is appropriate for the Examiner to withdraw each of them, which is respectfully requested. As such, the application is in condition for allowance and should be passed to issue in due course.

The present invention is new, nonobvious, and useful. Reconsideration and allowance of the claims is requested.

Dated: 7-13-05

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Wayne M. Kennard", is written over the typed name.

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